

EXHIBIT 4

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT-CRIMINAL DIVISION

FILED
AUG 04 2011
Judge Brosnahan-1811

PEOPLE OF THE STATE OF ILLINOIS)
)
) vs.) 09 CR-6422
)
)

Allen Robinson

ANSWER TO DISCOVERY

TO: Attorney of Record

Now come the PEOPLE OF THE STATE OF ILLINOIS, by their Attorney, Anita Alvarez, State's Attorney of Cook County, Illinois, through her Assistant, Tim Carter, and answer the defendant's motion for pre-trial discovery as follows:

1. (a) Bill of Particulars:

DATE: December 03, 2008

TIME: At approximately 9:12 p.m.

LOCATION: At or near 901 N. Lawler Ave., City of Chicago, County of Cook,
State of Illinois

(b) The physical description of the location of the occurrence is contained in the police reports tendered to the defense in open court.

2. (a) The people may or may not call the following persons as witnesses to the trial of this cause:

CHICAGO POLICE DEPARTMENT

Joanna Jaromin *16390
Brian Sherman *5742
Kevin Quinn *5944
Celal Surgit *10521
Joseph Bembynista *15359
Carl Brasic *10201
Vincent Celio *12569
Wayne Frano Jr. *8064
David Zelig *5443

EXHIBIT

BS Robinson 000080

Peter Babich *13992
Leonard Stocker *16837
Det. Donald Falk *20409
Det. Anthony Noradin *21252
Det. Timothy McDermott *21084
Det. John Folino Jr. *20143
Det. Carl Hattula *20516
Det. Bruno *20620
Det. Nickolas Spanos *21020
Det. Brian Tedeschi *20243
Det. Keith Olson *20168
Det. John Graham *21433
Det. Arthur Taraszkiewicz *21183
Det. Patrick McCormack *20573
Det. Joel Keeler *21002
Det. William Burke *20652
Det. Reno Biocci *21221
Det. David Healy *20855

CIVILIANS

Louise Hanford
Dr. Singh
Sheree Jones
Adina Baines
Chandra Lee
Darrick Stidwell
Oscar Russell
Lamarius Robinson
February Burae
Ozell Jackson
Johntay Washington
James Shannon
Jamion Winters
Antoino White
Deandre Guyton

Assistant State's Attorney's
ASA Andrew Dalkin
ASA Melissa Meana
ASA Tene McCoy-Cummings

Court Reporter's Office
Debra Kelly

Cook County Medical Examiner's Office
2121 West Harrison, Chicago, IL
Dr. James Filkins, M.D.

Illinois State Police Crime Lab
1941 West Roosevelt, Chicago, IL

Marc Pomerance
Medical Personnel from Cermak Health Services
2600 South California, Chicago, IL

Personnel from the Chicago Fire Department
Juan Galvez *18749
Ronald O'Keefe *19291
Personnel from the Office of Emergency Communications Center

Personnel from Crime Lab, any person named in police reports, arrest reports, inventory sheets, medical reports, laboratory reports, Preliminary Hearing or Grand Jury transcripts, evidence reports, or any other document tendered to or available to the defense.

Any witness needed to establish the chain of custody for physical evidence sought to be introduced at trial.

- (b) The following witnesses made written statements:

Deandre Guyton
Oscar Russell

Written statements of witnesses, if any, have been tendered to the defense in open court.

- (c) All memoranda reporting or summarizing oral statements made by witnesses are contained in the police reports tendered to the defense in open court.

3. The People may or may not call any or all persons listed in 2 (a) as occurrence witnesses at the scene of the offense or at the time of arrest.
4. (a) Written or recorded statements of the defendant or co-defendant(s), if any, have been tendered to the defense in open court. The date, time, and place of such statement(s), the circumstances under which it/they was/were made and the witnesses to the making or acknowledgment of the statement(s), are contained in the police reports tendered to the defense in open court. These statements may also be: Transcripts including but not limited to Grand Jury proceedings, Preliminary Hearings, depositions, prior trials or those created from video or audio tapes.

- (b) Summaries of oral statement(s) of the defendant or co-defendant(s), if any, the date, time, and place of such statement(s), the circumstances under which the statement(s) were made, and the witnesses present are contained in the police reports tendered to the defense in open court.
- 5. The transcript of the Grand Jury minutes and/or Preliminary Hearing, if any, will be made available to the defense for inspection and copying upon being received by the People.
- 6. (a) The following articles, if any, may or may not be offered into evidence by the People at the time of the trial of this cause: Electronically recorded interviews

Photographs, plats, charts, diagrams, illustrations, maps, any property inventoried by the Chicago Police Department and reflected in inventory receipts, copies of which are contained in the court file and also available for inspection and copying, certified copies of convictions and certified copies of auto records.

Any and all property mentioned in the police reports, arrest reports, medical reports, laboratory reports, Preliminary hearing or Grand Jury transcripts or any other document tendered to or available to the defense in open court.

- (b) The date, time, and place of acquisition, the persons involved in the acquisition and the circumstances of the acquisition of the articles are contained in the police reports tendered to the defense in open court.
 - (c) The People will comply with all reasonable requests for inspection by the defense.
- 7. Reports of experts, if any, made in connection with this particular case, including the results of physical or mental examinations, scientific tests, examinations, and comparisons, will be tendered to the defense upon being received by the People.
 - 8. Please see 6 (a) for any books, documents, photographs, and tangible objects obtained from or which belonged to the defendant, which the People may or may not use at the trial of this cause.
 - 9. The People have no knowledge at this time that any potential witnesses have any criminal convictions.
 - 10. The People intend to use certified copies of all convictions of the defendant, if any exist, for purposes of impeachment during the trial of this cause. The record of these convictions is available for inspection.
 - 11. The People may or may not rely on the following prior acts or convictions of the defendant of a similar nature for proof of knowledge, intent, motive, scheme, or design:

None at this time. Our investigation continues

12. The dates, times, places, circumstances, results, and persons present at any identification confrontations involving the defendant for crimes or offenses the People intend to use in the trial in this cause are contained in the police reports or other documents tendered to the defense in open court.

Any photographs available to the People, which were used in connection with any photographic identification, will be made available for inspection.

Any lineup photographs available to the People will be made available for inspection.

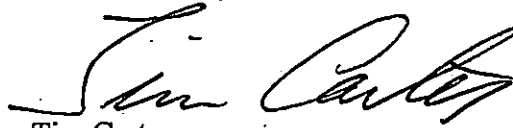
13. No electronic surveillance was employed in connection with this cause.
14. Any evidence which the People may use in the trial in this cause which was acquired by the execution of any legal process, whether a search warrant, arrest warrant or other process or court order, is listed in 5 (a) and in the police reports and other documents tendered to the defense in open court, if such process was used.

A copy of any legal process executed in connection with any evidence used in the trial in this cause will be available for inspection and copy if a copy is not in the court file.

15. No informant that the People intend to call as a witness in the trial of this cause exists.
16. The People are unaware of any evidence or witnesses which may be favorable to the defense in this cause.
17. The People will comply with lawful orders of the Court in this cause.

ANITA ALVAREZ
State's Attorney of Cook County

By:


Tim Carter
Assistant State's Attorney